

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
JAMES L. WAGGONER	§	
TRACHELL M. WAGGONER	§	CASE NO. 09-38464-H3-7
	§	
Debtors	§	

**FIRST AMENDED MOTION TO REOPEN CHAPTER 7 BANKRUPTCY
TO THE HONORABLE JUDGE OF SAID COURT:**

To the Creditors: **IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN 21 DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE THE COURT MAY TREAT THE PLEADINGS AS UNOPPOSED AND GRANT THE RELIEF.**

IF A PARTY REQUEST EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPIDICIAALLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY DAYS, YOU MUST RESPOND IN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO RESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Frank Steelman, Attorney of Record for JAMES L. WAGGONER and TRACHELL M. WAGGONER, Debtors files this Motion to reopen their Chapter 7 Bankruptcy.

1. On JULY 19, 2010, a Notice of Chapter 7 Case Closed without Discharge for failure to file the Debtor's Certification of Completion of Instructional Course concerning personal Financial Management for the above referenced case was filed.

2. JAMES L. WAGGONER and TRACHELL M. WAGGONER did take the Debtor's Education Course on AUGUST 7, 2010. The Certificate is attached to this Motion to reopen the Chapter 7 Bankruptcy Case.
3. The Debtors have paid the \$260.00 filing fee to reopen the case.

WHEREFORE, the Debtors pray that, the request for the Court to reopen this Bankruptcy proceeding and continue to discharge.

Respectfully submitted on this 7th day of March, 2011.



Frank Steelman
Attorney at Law
1810 Greenfield Plaza
Bryan, TX 77802
(979) 260-9774
(979) 846-3078 Fax
State Bar No. 19109000

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document and the notice and order were forwarded on this 7th day of March, 2011, by United States First-class mail to the following:



Frank Steelman

US Trustee
515 Rusk, Ste 3516
Houston, TX 77002

Ben B. Floyd
Chapter 7 Trustee
700 Louisiana St., Ste. 4600
Houston, TX 77002-2732

James and Trachell Waggoner
5113 Congressional
College Station, TX 77845

American Home Mortgage Servicing
PO Box 631730
Irving, TX 75063-1730

American Home Mortgage Servicing, Inc.
PO Box 660029
Dallas, TX 75266-0029

American Infosource LP as agent for Fia
PO Box 248809
Oklahoma City, OK 73124-8809

AT&T Universal Card
PO Box 6940
The Lakes, NV 88901

Bank of America
PO Box 15019
Wilmington, DE 19886-5019

Beneficial
PO Box 5608
Glendale Heights, IL 60139-5608

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Cbe Group
131 Tower Park Dr., Suite 1
Waterloo, IA 50702

Cit Fin Serv.
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64195

Dale Webb and Deborah Webb
3131 East 29th St., Ste. D200
Bryan, TX 77802

Discover Bank
DFS Services, LLC
PO Box 3025
New Albany, OH 43054-3025

Discover Card
PO Box 3095

Financial Corporation of America
PO Box 203500
Austin, TX 78720-3500

G M A C
PO Box 130424
Roseville, MN 55113

GE Money Bank
c/o Recovery Management Systems Corp.
25 SE 2nd Ave., Ste. 1120
Miami, FL 33131-1605
Attn: Ramesh Singh

Independent Bankers Bank
c/o Creditors Bankruptcy Service
PO Box 740933
Dallas, TX 75374

Internal Revenue Service
PO Box 21126
Philadelphia, PA 19114

Jeffrey Burns
Attorney at Law
3131 East 29th Street, Ste. D200
Bryan, TX 77802

Joe M. Lozano, Jr.
Brice, Vander Linden, Wernick, PC
9441 LBJ Freeway, Suite 350
Dallas, TX 75243

JP Morgan Chase Bank, National Association
MailStop SCI-3055
2210 Enterprise Dr.
Florence, SC 29501

Leading Edge Recovery Solutions, LLC
5440 N. Cumberland Ave., Ste. 300
Chicago, IL 60656-1490

Macys/fdsb
Macy's Bankruptcy
PO Box 8053
Mason, OH 45040

McCarthy, Holthus & Ackerman, LLP
Attn: Cole D. Patton
1255 W. 15th Street, Suite 1060
Plano, TX 75075

PRA Receivables Management, LLC
PO Box 41067
Norfolk, VA 23541

Recovery Management Systems Corporation
For Capital Recovery III LLC
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131

Richard J. Boudreau & Associates
5 Industrial Way
Salem, NH 03079

RJM Acquisitions
575 Underhill Blvd.
Suite 224
Syosset, NY 11791-3416

Spirit of Texas Bank
701 University Dr. E.
College Station, TX 77840

Transworld Systems, Inc.
Collection Agency
PO Box 1864
Santa Rose, CA 95402